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Judge Chun

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FAMILIAS UNIDAS POR LA JUSTICIA,  
AFL-CIO, a labor organization

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
LABOR, and LORI CHAVEZ-DeREMER, in  
her official capacity as United States Secretary  
of Labor,

Defendants.

CASE NO. C24-0637JHC

**STIPULATION FOR ORDER  
ESTABLISHING BRIEFING  
SCHEDULE AND EXTENDING  
DISPOSITIVE MOTION CUT-OFF  
DATE; ORDER THEREON**

(Note on Motion Calendar for:  
June 10, 2025)

WHEREAS on May 14, 2025, Plaintiff filed a motion for partial summary judgment, which is presently noted on the Court's motion calendar for June 11, 2025 (Dkt. # 165); and

WHEREAS the parties have agreed on a briefing schedule on cross-motions for summary judgment which they are requesting the Court to order; and

WHEREAS on June 4, 2025, Plaintiff filed a motion to extend the dispositive motion cut-off date to November 30, 2025, in order to allow for a possible future motion for summary judgment on its non-response bias claim (Dkt. # 170); and

WHEREAS Defendants do not object to Plaintiff's request to move the dispositive motion cut-off date for this purpose;

NOW THEREFORE, the parties, through their respective attorneys of record, do hereby

STIPULATION FOR ORDER ESTABLISHING BRIEFING SCHEDULE AND EXTENDING  
MOTION CUT-OFF DATE; ORDER THEREON - 1

(Case No. C24-0637JHC)

1 stipulate and agree that the Court may make and enter the following order:

2       1. Plaintiff's motion for partial summary judgment (Dkt. # 165) is renoted and a briefing  
3 schedule established as follows:

4           a. Defendants' Opposition and Cross-Motion for Summary Judgment (limited to  
5           8,400 words) shall be filed no later than Tuesday, June 24, 2025.

6           b. Plaintiffs' Reply and Opposition to Defendants' Cross-Motion for Summary  
7           Judgement (limited to 8,400 words) shall be filed no later than July 2, 2025.

8           c. Defendants' Reply Memorandum (limited to (4,200 words) shall be filed no  
9           later than July 18, 2025

10          d. Both Plaintiff's motion for partial summary judgment and Defendants' cross-  
11          motion for summary judgment shall be noted for July 18, 2025.

12       2. The non-dispositive motion cut-off date shall be continued to September 30, 2025, for the  
13      limited purpose of permitting Plaintiff to move to supplement the record to permit the addition of a  
14      report of an opinion by Plaintiff's expert witness in support of its non-response bias claim.

15       3. The dispositive motion cut-off date shall be continued to November 30, 2025, to allow  
16      Plaintiff to move for summary judgment on its non-response bias claim.

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28 STIPULATION FOR ORDER ESTABLISHING BRIEFING SCHEDULE AND EXTENDING  
MOTION CUT-OFF DATE; ORDER THEREON - 2  
(Case No. C24-0637JHC)

4. Plaintiff's Motion for Limited Extension of Case Deadlines (Dkt # 170) shall be denied as moot.

## **SO STIPULATED.**

DATED this 10th day of June 2025.

**TEAL LUTHY MILLER**  
Acting United States Attorney

/s/ Brian C. Kipnis  
BRIAN C. KIPNIS  
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## Attorneys for Defendants

I certify that this memorandum contains 341 words, in compliance with Local Civil Rule LCR 7(e)(2).

## **SO STIPULATED.**

DATED this 10th day of June 2025.

## COLUMBIA LEGAL SERVICES

s/ Andrea Schmitt  
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Attorneys for Plaintiff

**STIPULATION FOR ORDER ESTABLISHING BRIEFING SCHEDULE AND EXTENDING  
MOTION CUT-OFF DATE; ORDER THEREON - 3**  
(Case No. C24-0637JHC)

## ORDER

IT IS SO ORDERED. The Court DIRECTS the Clerk to re-note the motion at Dkt. # 165 for July 18, 2025. The Court DENIES as moot the motion at Dkt. # 170.

DATED this 11<sup>th</sup> day of June 2025

*John H. Chun*  
JOHN H. CHUN  
United States District Judge

**STIPULATION FOR ORDER ESTABLISHING BRIEFING SCHEDULE AND EXTENDING  
MOTION CUT-OFF DATE; ORDER THEREON - 4**  
(Case No. C24-0637JHC)